

MUN SU PARK, ESQ.
LAW OFFICE OF PARK
East-West Business Center, Suite 113
744 N. Marine Drive
Tumon, Guam 96913
Tel: (671) 647-1200
Fax: (671) 647-1211
Counsel for Plaintiff PEOPLE HOLDINGS CO., LTD

FILED
DISTRICT COURT OF GUAM
SEP 11 2003
MARY L. M. MORAN
CLERK OF COURT

4

IN THE UNITED STATES
DISTRICT COURT OF GUAM
TERRITORY OF GUAM

PEOPLE HOLDINGS CO., LTD.,

Plaintiff,

vs.

SUN Y. WAKUGAWA, KOWON
SHIPPING CORP., and SINO
TRADING GUAM, INC.

Defendants.

Civil Case No. 03-00034

DECLARATION IN SUPPORT OF
MOTION FOR
PRELIMINARY INJUNCTION

I, Hak B. Kim, declare as follows:

1. I am the director of Plaintiff PEOPLE HOLDINGS CO., LTD., in the above-entitled action.

2. Defendant SUN Y. WAKUGAWA has received approximately \$206,000.00 from Plaintiff in exchange for Defendant s shipping to Plaintiff DRMO metal scrap located in the US Naval Base on Guam.

3. Defendants sent the notices of cancellation in which fraudulent charges set out in account stated.

4. Defendants now attempt to sell the said metallic scrap to other corporation such as Rising Year, International Guam Corp.

5. Plaintiff will suffer great harm if Defendants export the DRMO metal scrap currently located in the US Naval Base on Guam for sale and disposition by means other than those required by the contract.

ORIGINAL

6. Exporting the DRMO metal scrap currently located in the US Naval Base on Guam, or any sale of the aforesaid DRMO metal scrap by means other than applying all net profits from said sale to the debt owed by Defendants to Plaintiff will result in immediate irreparable injury.

I declare under penalty of perjury under the Laws of the United States that the foregoing is true and correct.

EXECUTED this 8th day of September, 2003.

People Holdings
HAK B. KIM
Duly Authorized Representative,
PEOPLE HOLDINGS CO. LTD.